

Exhibit 2

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----
5 SPENCER MEYER, individually and on
6 behalf of those similarly situated,

7 Plaintiffs,

8 vs. 1:15 Civ. 9796 (JSR)

9 TRAVIS KALANICK,

10 Defendant.
11 -----

12
13 DEPOSITION OF MIGUEL SANTOS-NEVES

14
15 Tuesday, June 14, 2016

16 9:13 a.m.
17
18
19
20
21

22 Reported by:

23 Joan Ferrara, RPR, RMR, CRR

24 Job No. 174299
25

June 14, 2016

9:00 a.m.

New York, New York

Deposition of MIGUEL

SANTOS-NEVES, held at the offices of McKool
Smith, One Bryant Park Avenue, New York,
New York, pursuant to Notice, before Joan
Ferrara, a Registered Professional and
Merit Reporter and Notary Public of the
State of New York.

1 M. Santos-Neves
2 not on the e-mail chain. Can you take a
3 look at it and tell me if you recognize the
4 subject matter?

5 A. During preparation for
6 deposition, allusion was made to this
7 particular document, but this is the first
8 time that I'm seeing it.

9 Q. So the top e-mail is an e-mail
10 from Matthew Moneyhon to Todd Egeland, May
11 20th of this year.

12 And Mr. Moneyhon states:

13 "Miguel Santos-Neves is the only
14 person that had any contact with anyone on
15 this matter. You should know that it's our
16 intention to dismiss him for breach of our
17 research protocol. We will, however, keep
18 him on staff until we hear from you that he
19 is not needed for any further explanation."

20 Is that the first time that you
21 heard that you -- that Mr. Moneyhon
22 believes you breached the research
23 protocol?

24 A. Yes.

25 Q. Were you ever informed that you